

Exhibit 1

From: [Ross MacDonald](#)
To: Brenda_Rinozzi@ilnd.uscourts.gov
Cc: [Aundrea K. Gulley](#); [Brian T. Ross](#); [Miller, Britt M.](#); [Provance, Matthew D.](#); [Nemelka, Michael N.](#); [Ho, Derek T.](#); [Wedgworth, Peggy](#)
Subject: In re Dealer Management Antitrust - 1:18-cv-864 (Dkt. 695)
Date: Wednesday, June 5, 2019 1:40:00 PM

Dear Brenda,

In the Court's Docket Entry No. 695, the Court advised the Parties that to the extent they reached an impasse on any of the outstanding Authenticom discovery issues identified in their May 8, 2019 Joint Proposed Agenda (Dkt. 684), "they should contact the Court's courtroom deputy via email with a bullet point list of the issues that remain in dispute (identifying the issues without argument) and a proposed briefing schedule to address those issues." The Parties have conferred and believe that two of the issues previously identified remain unresolved and are ripe for the Court's decision. These two issues are:

- Defendants' request for Authenticom to produce an example log of its Polling Client Manager ("PCM"); and
- Objections and instructions related to DataVast, a product developed by a former Authenticom affiliate, Xcelerated, raised at Authenticom's Fed. R. Civ. P. 30(b)(6) deposition.

The Parties have further conferred and have agreed to a proposed briefing schedule. While we apologize for the late notice, the Parties have agreed for the Defendants to file their motion today, June 5. Authenticom has then agreed to file a response by Friday, June 7. The Parties can then be available to discuss the issues with the Court at the previously scheduled status hearing on Monday, June 10. If at that time, however, the Court decides it needs more time to consider the issues, or that it would like a reply brief from Defendants, the Parties are happy to oblige and/or convene for a hearing at a later date.

Please let us know if this is acceptable to the Court. I have copied all lead counsel on this email.

Best,

Ross

Ross MacDonald

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